IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

GERALD RUHNOW; CONNIE * RUHNOW, *

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Plaintiffs, * Civil Action

File Number 2:05-cv-527-F

V. *

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LANE HEARD TRUCKING, et. al.,

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Defendants.

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NORTHLAND INSURANCE CO. *

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Intervener,

*

V. *

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LANE HEARD TRUCKING, et. al.

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Defendants. *

NORTHLAND INSURANCE COMPANY'S OBJECTIONS TO LANE HEARD TRUCKING, LLC'S PROPOSED VOIR DIRE

COMES NOW, Northland Insurance Company, through counsel submits its objections to the following of Lane Heard Trucking, LLC's proposed voir dire questions.

- 4. Objection. No foundation, argumentative and cumulative of Question #20.
- 5. Objection. No foundation, argumentative and cumulative of Question #20. Northland specifically objects to the term "angry" as vague and argumentative.

- 6. Objection. No foundation, argumentative and cumulative of Question #20.
- 15. Objection. Lane Heard does not site the specific law referred to in this question. Alternatively, since Northland is also a corporation, if this question is presented to the jury, Northland requests that it be included in this question.
- 21. Objection. Proper as a jury charge only, not voir dire. Alternatively, if this question is presented to the jury, Northland requests that it be revised to include the statement that Michael Duke, Lane Heard's employee, died in the accident that is the subject of this lawsuit and that the jury must not allow any sympathy for him to influence its decision in this case.

Respectfully submitted this 25th day of January, 2007.

/s/ Linda Hinson Ambrose, Esq. ASB 1753-B386 Attorney for Northland Insurance Company

OF COUNSEL: ROGERS AND ASSOCIATES 3000 Riverchase Galleria, Suite 650 Birmingham, Alabama 35244 (205) 982-4620 (205) 982-4630 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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> Respectfully submitted, /s/ Linda Hinson Ambrose **ROGERS & ASSOCIATES** Suite 650 Birmingham, Alabama 35244 (205) 982-4620 (205) 982-4630 – FAX E-mail: lambrose@spt.com ASB - 1753-B38L